

Appln No. 09/851,722  
Amdt date March 22, 2006  
Reply to Office action of January 30, 2006

### REMARKS/ARGUMENTS

Claims 1-20 are pending. Claims 1, 11, and 17 are amended.

Claims 1-20 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Rakib (US 6,889,385 B1) in view of Zhang (US 6,661,785).

Amended independent claim 1 includes, among other limitations, "a gateway coupled to the first and second telephone line lines and an internet protocol (IP) network, and configured to exchange voice and data packets between the IP network, each of the media terminal adapters over the first telephone line, and the analog telephone over the second telephone line,

wherein the gateway receives a packet payload from the IP network and determines if the received packet payload is voice packet or data packet, if the received packet payload is a voice packet, the gateway further determines if the voice packet is destined for the analog telephone or a media terminal adapter, if the voice packet is destined for the analog telephone, the gateway depacketizes the voice packet, generates an analog voice signal, and transmits the analog voice signal via the first telephone line to the analog telephone, if the voice packet is destined for the media terminal adapter, the gateway reformats the voice packet and transmits the reformatted voice packet via the second telephone line to the media terminal adapter." Applicants respectfully submit that none of the cited references, alone or in combination, teach or suggest the above limitations.

For example, the gateways in Rakib at customer sites interface to a headend source, "recover digital data from the source or digitize incoming analog signals, . . . encapsulate the data into IP packets and then into LAN packets and route the packets to the peripheral that requested the program/service." (Col. 13, line 60 to col. 14, line 4, underlining added.). Furthermore, Rakib makes it clear that "telephony works the same way," in which, data bytes from T1 timeslots assigned to a particular conversation are packetized "into IP packets addressed to, for example, [digital] telephone 108. These IP packets . . . are then transmitted downstream to

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gateway 28 . . . . At gateway 28, the IP packets addressed to telephone 108 are recovered and encapsulated into Ethernet or other LAN packets addressed to telephone 108. At the telephone, the Ethernet packets are received and the encapsulated IP packets are recovered. . . ." (Col. 14, line 56 to col. 15, line 5, underlining added.). Therefore, the gateways of Rakib receive analog or digital data from a headend, convert the received data to IP packets for transmission over a LAN to digital peripheral devices, such as the digital telephone 108.

Similarly, Zhang's gateway 128 "converts the packet-switched data to PSTN and forwards it along the path to PSTN caller 114." (Col. 13, lines 17-19, emphasis added.). Zhang clearly states that "this function does not include determining to what IP address the converted PSTN signals should go, which is the function of SCP 120. Instead, to convert PSTN signals to IP signals, gateway 128 samples and packetizes the voice PSTN signals, translates the PSTN signaling information into IP signaling information, and sends the voice packets to subscriber 112." (Col. 13, lines 27-29). In other words, Zhang's gateway 128 is only connected to single PSTN line and not to a second telephone line that includes a plurality of media terminal adapters.

Consequently, Rakib and Zhang combination does not teach, nor does it suggest all of the limitations of the amended claim 1 and thus claim 1 is patentable over cited references.

Amended claims 11 and 17 include similar limitations. Therefore, claims 11 and 17 are also patentable over cited references.

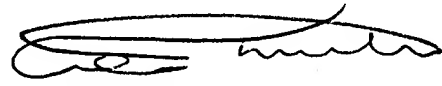
In short, independent claims 1, 11 and 17 define a novel and unobvious invention over the cited references. Dependent claims 2-10, 12-16, and 18-20 are all dependent, directly or indirectly from independent claims 1, 11 and 17, respectively, and therefore include all the limitations of their base claims and additional limitations therein. Accordingly, these claims are also allowable for the same reason set forth hereinbefore as well as the additional limitations recited.

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In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,  
CHRISTIE, PARKER & HALE, LLP

By



Raymond R. Tabandeh  
Reg. No. 43,945  
626/795-9900

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